



So Ordered.

Dated: August 12, 2022

G. Michael Halfenger  
Chief United States Bankruptcy Judge

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION**

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In re:

Chapter 13

Daniel Thomas Lorum,  
Jessica Susan Lorum,

Case No. 18-23131-gmh

Debtors.

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**ORDER ON MOTION FOR ABANDONMENT AND  
RELIEF FROM THE AUTOMATIC STAY**

On July 21, 2022, Federal Home Loan Mortgage Corporation, as Trustee for the benefit of the Freddie Mac Seasoned Loans Structured Transaction Trust, Series 2021-1 (“Creditor”) filed a motion for abandonment pursuant to 11 U.S.C. §554 and relief from the 11 U.S.C. §362(a) stay to pursue its lien rights in the property located at 5467 South 113<sup>th</sup> Street, Hales Corners, WI 53130. The Creditor and the Debtor have agreed to resolve the motion. A copy of their agreement is attached to this order.

Based on the record and the attached agreement, **IT IS ORDERED:**

The stay imposed by 11 U.S.C. §362(a) is modified to the extent necessary to give effect to the conditions stated in the agreement attached to this order. Abandonment pursuant to 11 U.S.C. §554 shall be granted when and if relief from stay is granted to the Creditor. The motion is otherwise denied.

This order is a Doomsday Order under this court’s Uniform Procedure for Doomsday Orders; it incorporates and is subject to the Uniform Procedure for Doomsday Orders.

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In re:

Chapter 13

Daniel Thomas Lorum,  
Jessica Susan Lorum,  
Debtors.

Case No. 18-23131-gmh

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**STIPULATION RESOLVING THE MOTION OF  
FEDERAL HOME LOAN MORTGAGE CORPORATION,  
AS TRUSTEE FOR THE BENEFIT OF THE FREDDIE MAC SEASONED LOANS  
STRUCTURED TRANSACTION TRUST, SERIES 2021-1  
FOR ABANDONMENT AND RELIEF FROM THE AUTOMATIC STAY**

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The undersigned parties hereto submit this Stipulation resolving the motion for abandonment and relief from the automatic stay regarding the real property located at 5467 South 113<sup>th</sup> Street, Hales Corners, WI 53130 and show the Court the following:

**WHEREAS**, Federal Home Loan Mortgage Corporation, as Trustee for the benefit of the Freddie Mac Seasoned Loans Structured Transaction Trust, Series 2021-1, its successors and/or assignees (hereinafter collectively and at all times material hereto, the “movant”) is represented by its attorneys, Cummisford, Acevedo & Associates, LLC; the debtors, Daniel Thomas Lorum and Jessica Susan Lorum, are represented by Miller & Miller Law, LLC.; and the Chapter 13 Trustee is Scott Lieske.

**NOW, THEREFORE**, the parties agree as follows:

**Drafted by:**

Attorney Michael Acevedo  
Cummisford, Acevedo & Associates, LLC  
7071 S. 13<sup>th</sup> Street, Suite 100  
Oak Creek, WI 53154  
Ph: 414-761-1700  
Fax: 414-255-3008

**IT IS STIPULATED** that the movant may file a supplemental claim for the post-petition arrearage amount through July 31, 2022 of \$4,309.97, which is calculated as follows:

One (1) mortgage payment at \$1,066.08: (May 2022)	\$1,066.08
Two (2) mortgage payments at \$1,054.11 each: (June 2022 and July 2022)	\$2,108.22
Less suspense balance:	\$ (102.33)
Attorneys' fees and costs for this motion:	<u>\$1,238.00</u>
Total:	<u>\$4,309.97</u>

**IT IS FURTHER STIPULATED** the debtors shall amend the plan, if necessary, within twenty-one (21) days after the movant has filed the supplemental claim.

**IT IS FURTHER STIPULATED** that commencing August 2022 and continuing through and including January 2023, the debtors shall tender regular monthly post-petition mortgage payments to the movant in sufficient time to be received by the movant on or before the sixteenth (16<sup>th</sup>) day of each month. In the event any payment is not received by the movant in a timely manner, counsel for the movant may submit an affidavit of default and proposed order for abandonment and relief from the automatic stay to the court for signature. Pursuant to the terms of the Note, and pending further notice, the monthly mortgage payment amount is \$1,054.11 subject to adjustment due to escrow changes. The mortgage payments shall be mailed to Specialized Loan Servicing LLC, 6200 S. Quebec Street, Ste. 300, Greenwood Village, CO 80111.

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**IT IS FURTHER STIPULATED** that commencing February 2023, the debtors shall tender regular monthly post-petition mortgage payments to the movant in sufficient time to be received by the movant on or before the sixteenth (16<sup>th</sup>) day of each month. In the event any payment is not received by the movant in a timely manner, counsel for the movant may request by letter another hearing upon the motion for abandonment and relief from the automatic stay to the court for signature.

Dated this 11<sup>th</sup> day of August, 2022.

**Cummisford, Acevedo & Associates, LLC**

**Miller & Miller Law, LLC**

By: Michael Acevedo

Michael Acevedo, #1022634  
7071 S. 13<sup>th</sup> Street, Suite 100  
Oak Creek, WI 53154  
Attorney for movant

By: Jill M. Campo

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633 W. Wisconsin Avenue, Ste. 500  
Milwaukee, WI 53203-1918  
Attorney for Daniel and Jessica Lorum

**Chapter 13 Trustee**

By: Judith Du Sell Judith Du Sell  
2022-08-11 13:42:05

Scott Lieske  
PO Box 510920  
Milwaukee, WI 53203

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